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10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 JOSE BALMORE ROMERO,  
aka "Porky," and  
17 ERWIN ALEXANDER MELGAR,  
aka "Snoopy,"  
18

Defendants.  
19

No. CR 17-278-ODW-1, 6

JOINT STATEMENT OF THE CASE

Trial Date: May 16, 2023  
Location: Courtroom of the  
Hon. Otis D. Wright

20 Plaintiff United States of America, by and through its counsel  
21 of record, the United States Attorney for the Central District of  
22 California and Assistant United States Attorneys Jeffrey M.  
23 Chemerinsky, Shawn T. Andrews, and Amy E. Pomerantz, and defendant #1  
24 JOSE BALMORE ROMERO, by and through his counsel of record, Kenneth  
25 Reed, and defendant #6, ERWIN ALEXANDER MELGAR, by and through his  
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1 counsel of record, Edward Robinson, hereby submit a Joint Statement  
2 of the Case.

3  
4 Dated: May 5, 2023

Respectfully submitted,

5 E. MARTIN ESTRADA  
6 United States Attorney

7 MACK E. JENKINS  
8 Assistant United States Attorney  
9 Chief, Criminal Division

10 /s/  
JEFFREY M. CHEMERINSKY  
Assistant United States Attorney

11 Attorneys for Plaintiff  
12 UNITED STATES OF AMERICA

13  
14 Dated: May 7, 2023

/s/ by email authorization  
KENNETH REED

15 Attorney for Defendant  
16 JOSE BALMORE ROMERO

17  
18 Dated: May 6, 2023

/s/ by email authorization  
EDWARD M. ROBINSON

19  
20 Attorney for Defendant  
21 ERWIN ALEXANDER MELGAR  
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**JOINT PROPOSED STATEMENT OF THE CASE**

The indictment charges defendants with violations of federal criminal law. Specifically, the indictment alleges that defendants Jose Balmore Romero and Erwin Alexander Melgar are members of the MS-13 street gang, a criminal gang and enterprise that operates throughout Los Angeles. Defendants Romero and Melgar are alleged to have knowingly joined the gang and conspired with other MS-13 members and associates, in their roles as leaders of MS-13, to commit various crimes, including drug trafficking and extortion.

There are two different conspiracy charges in this case. First, defendants Romero and Melgar are both charged with Racketeer Influenced and Corrupt Organizations Conspiracy ("RICO"), in violation of 18 U.S.C. § 1962(d). Specifically, the indictment alleges that defendants Romero and Melgar knowingly conspired, from a date unknown and continuing to on or about May 10, 2017, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity. Second, defendants Romero and Melgar are charged with Conspiracy to Distribute Controlled Substances, in violation of 21 U.S.C. § 846.

Additionally, defendant Melgar is also charged with two counts of Distributing at Least 50 Grams of Methamphetamine, in violation of 18 U.S.C. §§ 841(a)(1), (b)(1)(A).

Defendants Romero and Melgar have pled not guilty to all of these charges.